

# EXHIBIT “A”

**Kathleen O'Connell-Bell**

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**From:** Alec Leslie <aleslie@bursor.com>  
**Sent:** Thursday, July 29, 2021 9:57 AM  
**To:** James Sargent  
**Cc:** Joe Marchese; Rocco P. Imperatrice III; Kathleen O'Connell-Bell  
**Subject:** Re: BREZINSKI v. WIDENER  
**Attachments:** WID002573-75.pdf

Jim:

Thank you for the call yesterday. As we discussed, the reason Plaintiff seeks to notice Dr. Wollman's deposition is because she has authored and received many relevant emails that you have produced to us in response to Plaintiff's Requests for Production. By way of example, I am attaching a document bearing Bates No. WID-002573-75. This document shows an email authored by Wollman in which she discusses the topic of Defendant's response to Covid, including how students value an on-campus education vs. an education that is not provided on campus. These topics are clearly germane to the issues and claims in this case. Thus, we believe we are entitled to her testimony on these topics as she is the author of many relevant emails.

We are mindful that Dr. Wollman has a busy schedule. We also are aware of your stated concerns about Widener's resumption of classes for the new school year. For these reasons, we have offered a compromise of capping her deposition to 4 hours on the record, and we are willing to stipulate that her deposition be taken remotely. We hope this obviates the need to burden the Court with any motion practice.

On the call, you also asked us to provide you with a list of additional deponents so that you can begin to inquire about availability. The list is as follows:

Christian Johnson  
Thomas Malloy  
Joanne Keating  
Kathryn Herschede  
Gregory Potter

Finally, you proposed a 90-day extension of the schedule to complete fact discovery. As you know, we believe a 60-day extension of the schedule is workable and more appropriate. Please let us know how your client intends to proceed on these issues later today.

Sincerely,

Alec

# EXHIBIT “B”

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

SARAH BREZINSKI, on behalf of herself and  
all others similarly situated,

Plaintiff,

v.

WIDENER UNIVERSITY,

Defendant.

Case No. 2:20-cv-4939-JMY

**NOTICE OF DEPOSITION OF JULIE  
WOLLMAN**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT, pursuant to the Federal Rules of Civil Procedure,  
Plaintiff Sarah Brezinski hereby requests that Julie Wollman testify at a deposition.

The deposition will begin on August 19, 2021, at 10:00 a.m. EST, and will be taken  
remotely, unless agreed otherwise by counsel, and will be held before a notary public or other  
person authorized to administer oaths in this action. The deposition will continue from day to  
day until completed or otherwise adjourned, and may be recorded by stenographic, audio,  
audiovisual, video and/or real-time computer means.

Dated: August 3, 2021

**BURSOR & FISHER, P.A.**

By: /s/ Joseph I. Marchese  
Joseph I. Marchese

Joseph I. Marchese (*Pro Hac Vice*)  
Alec M. Leslie (*Pro Hac Vice*)  
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*Attorneys for Plaintiff*

**PROOF OF SERVICE**

I am a resident of the State of New York, over the age of eighteen years, and not a party to the within action. My business address is Bursor & Fisher, P.A., 888 Seventh Avenue, Third Floor, New York, New York 10019. On August 3, 2021, I served and/or caused to be served the above document to all counsel of record via email and hard copy mail.

I declare under penalty of perjury under the laws of the State of New York that the above is true and correct. Executed on August 3, 2021, at New York, NY.

/s/ Alec M. Leslie